

DeMaria, Eva

From: HeldtSheller, Stephanie <SHeldtSheller@nwpipe.com>
Sent: Tuesday, August 25, 2015 4:22 PM
To: ORR Jim
Cc: THIESSEN Kenneth; MCCLINCY Matt; Claudia Powers; Wray, Mike; 'Ken.Shump@CH2M.com'
Subject: RE: Meeting Comments and EPA Letter Review Schedule
Attachments: 2014-08-14 NWP Ltr Response to DEQ RI-SCE comments & Mtg minutes.pdf

Jim,
Thanks again for the phone call last Friday. I told you that I would confirm whether NWP is pursuing a site-wide NFA or a Source Control Decision at this time, as it made a difference in the level of effort or timing in your RI/SCE comments. Our July 2014 meeting minutes state *"Significant conversation occurred clarifying that the DEQ comments were crafted with the intent that NWP was pursuing a Site-Wide No Further Action (NFA) Determination. The DEQ stated that the Report is very close to meeting both the Source Control Recommendation needs, as well as the Site-Wide NFA needs, that comments leaned towards NWP getting both with the revised document. NWP agreed to pursue both a Source Control NFA and a Site-Wide NFA to increase efficiencies, **but only if the latter did not slow the Source Control determination.**" (Emphasis added.)* I've attached this summary for your quick reference.

For NWP, the most important action by DEQ is the Source Control Decision. This is our top priority; our main focus. If the site-wide NFA review is slowing the Source Control Decision process, we respectfully ask to please set it aside and focus on the Source Control process.

Please let me know if there is anything else I can do to help move things along. Thanks, and have a good evening!
Steph.

Stephanie Heldt-Sheller, CHMM
Corporate Environmental Manager
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From: HeldtSheller, Stephanie
Sent: Friday, August 21, 2015 9:36 AM
To: 'ORR Jim'
Subject: RE: Meeting Comments and EPA Letter Review Schedule

OK thanks for the update Jim. Do you have any idea when NWP might expect to see the comments? What is a "little behind?"

Thanks!
Steph.

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From: ORR Jim [<mailto:orr.jim@deg.state.or.us>]
Sent: Thursday, August 20, 2015 6:36 AM

To: HeldtSheller, Stephanie
Subject: RE: Meeting Comments and EPA Letter Review Schedule

Thanks Stephanie, I am a little behind, Please call if you wish to discuss.

Nice to have you back.

Thank You

*Jim Orr
DEQ Northwest Region
700 NE Multnomah St. Suite 600
Portland, Oregon 97232
503-229-5039*

From: HeldtSheller, Stephanie [<mailto:SHeldtSheller@nwpipe.com>]
Sent: Wednesday, August 19, 2015 1:39 PM
To: ORR Jim
Cc: THIESSEN Kenneth; MCCLINCY Matt; Wray, Mike; 'Ken.Shump@CH2M.com'; Claudia Powers (Ckp@aterwynne.com)
Subject: RE: Meeting Comments and EPA Letter Review Schedule

Thanks for the update Jim.

We will continue to stay tuned for DEQ's RI/SCE comments. Once DEQ comments are received, we will get our comment responses back to EPA/DEQ.

Thanks again-
Steph.

Stephanie Heldt-Sheller, CHMM
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From: ORR Jim [<mailto:orr.jim@deg.state.or.us>]
Sent: Monday, August 17, 2015 8:21 AM
To: HeldtSheller, Stephanie
Cc: THIESSEN Kenneth; MCCLINCY Matt; Wray, Mike; 'Ken.Shump@CH2M.com'; Claudia Powers (Ckp@aterwynne.com)
Subject: RE: Meeting Comments and EPA Letter Review Schedule

Stephanie, I am still behind in providing comments for the SCE but will get them out this week. I apologize for the delay.

My primary comments for the SCE relate to the NFA issues and agreement with EPA concerns regarding the VOCs in groundwater evaluation.

Please give me a call, if you wish to discuss.

Thank You

Jim Orr
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From: HeldtSheller, Stephanie [<mailto:SHeldtSheller@nwpipe.com>]
Sent: Friday, August 14, 2015 3:40 PM
To: ORR Jim
Cc: THIESSEN Kenneth; MCCLINCY Matt; Wray, Mike; 'Ken.Shump@CH2M.com'; Claudia Powers (Ckp@aterwynne.com)
Subject: RE: Meeting Comments and EPA Letter Review Schedule

Hello Jim,

I have returned from my leave and will resume as NWP's point of contact with DEQ Source Control, along with Ken Shump. In response to your email below, I hope the following completes the phone meeting summary correspondence.

DEQ and NWP had a teleconference on June 11, 2015. DEQ provided a meeting summary on June 16, and NWP provided amendments to DEQ's summary on July 2, 2015. DEQ responded to NWP amendments July 22, 2015. In an August 4, 2015 email thread, DEQ requested NWP again provide the amendments. Therefore NWP has attached and will certify mail the amended meeting summary, using **red, bold and underlined font**. Thank you for including these points in the public record.

As you probably know, NWP's response to EPA's April 29, 2015 RI/SCE comments will need to be coordinated with DEQ RI/SCE comments in mind. Since we haven't received DEQ's comments, NWP is at a bit of a standstill. In the August 4th email below, the delivery date from DEQ was the end of the next week, which brings us to today. Will DEQ be pushing out the delivery date again, and if so when should NWP expect the comments?

Thanks, and happy Friday!
Steph.

Stephanie Heldt-Sheller, CHMM

Corporate Environmental Manager

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From: ORR Jim [<mailto:orr.jim@deg.state.or.us>]
Sent: Tuesday, August 04, 2015 11:40 AM
To: Wray, Mike; 'Ken.Shump@CH2M.com'
Cc: HeldtSheller, Stephanie; THIESSEN Kenneth; MCCLINCY Matt
Subject: RE: Meeting Comments and EPA Letter Review Schedule

Mike,

The primary reason for declining the inclusion of the Ken's meeting summary information was that it was not representative of what DEQ recalled from the meeting.

We do have disagreements with some aspects of the source control evaluation, but DEQ is always willing to include all points of view in the public record.

Please submit the amended meeting summary to DEQ.

Please call if you have any other concerns regarding the project.

Thank You

Jim Orr

DEQ Northwest Region

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From: Wray, Mike [<mailto:MWRAY@nwpipe.com>]
Sent: Tuesday, August 04, 2015 9:55 AM
To: ORR Jim; 'Ken.Shump@CH2M.com'
Cc: HeldtSheller, Stephanie; THIESSEN Kenneth; MCCLINCY Matt
Subject: RE: Meeting Comments and EPA Letter Review Schedule

Jim,

Thank you for the update. Northwest Pipe is finalizing a response to the EPA's comments and anticipate and certainly hope for no further delays of the DEQ comments. Once we have received the DEQ comments we will review our response in light of those comments and forward on to you.

Also, I see below that you have indicated your intention to decline to include information that was discussed in the call in the formal summary of the conversation. While I recognize that DEQ and Northwest Pipe may not agree on all aspects of the facts, declining to include factual information and differing interpretations of those facts that were discussed would create an inappropriately censored record of the conference call. Northwest Pipe requests that you reconsider your intention to not include in the meeting summary viewpoints that were discussed, as requested in Ken's email.

Thanks,

Mike Wray
Northwest Pipe Company

From: ORR Jim [<mailto:orr.jim@deq.state.or.us>]
Sent: Tuesday, August 04, 2015 8:53 AM
To: 'Ken.Shump@CH2M.com'
Cc: Wray, Mike; HeldtSheller, Stephanie; THIESSEN Kenneth; MCCLINCY Matt
Subject: RE: Meeting Comments and EPA Letter Review Schedule

Ken, as you may have noticed I have not yet sent our comments for the SCE.

I hope to get them to your group late next week.

Thank You

Jim Orr

DEQ Northwest Region

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From: ORR Jim
Sent: Wednesday, July 22, 2015 2:10 PM
To: Ken.Shump@CH2M.com
Cc: MWRAY@nwpipes.com; sheldtsheller@nwpipes.com; THIESSEN Kenneth; MCCLINCY Matt
Subject: RE: Meeting Comments and EPA Letter Review Schedule

Ken, I need to have a more time to provide DEQ comments for the SCE. I had to take a few days off and it has pushed several projects. I would estimate to deliver our comments by July 31st.

I have responded to your questions regarding our conference call meeting summary below. If you have questions please let me know.

Thank You

*Jim Orr
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From: Ken.Shump@CH2M.com [<mailto:Ken.Shump@CH2M.com>]
Sent: Thursday, July 02, 2015 11:05 AM
To: ORR Jim
Cc: MWRAY@nwpipes.com; sheldtsheller@nwpipes.com
Subject: RE: Meeting Comments and EPA Letter Review Schedule

Hi Jim,

We're working on a response to the EPA letter and I expect you will receive it in late July. You mentioned in the meeting that you would have DEQ comments to us by around July 3. Would it be possible for you to give us an update on that?

You previously had asked a question about Table 8-2 and Figure 8-2 in the RI/SCE document. I checked the document and confirmed that the November 2013 source control results are contained in Table 8-2. However, you're correct that Figure 8-2 did not have the results noted, nor did Appendix A contain the specific laboratory report for that sampling event. A revised Figure 8-2 and the lab report you requested are attached as pdf files. Unless you object, we will issue replacement optical discs and any replacement sheets to document changes in response to comments after we receive the Department's comments on the report.

I have a few comments on your letter containing the conference call notes, and have pasted the pertinent paragraphs with the additions in red font below. We would appreciate it if you revised the letter to include the noted clarifications.

Ken

Matt McClincy spoke about the process of source control. Source control should identify sources that are a risk to river receptors and have the potential for sediment recontamination. Volatile organic compounds from the southeast groundwater plume are not a recontamination issue but exceed Aquatic Water Quality Criteria (AWQC) for vinyl chloride and PCE at monitoring wells near the head of Terminal 4, Slip 1 (**which Ken Shump noted was approximately 100 to 150 feet inland with no aquatic receptors at the well**). Current EPA Preliminary Remediation Goals (PRG) for vinyl chloride and PCE are 0.02 ug/L and 0.2 ug/L

respectively. DEQ considers the groundwater plume to be a potential Hot Spot because it exceeds AWQC and may require a feasibility study and remedial action to restore water quality. EPA considers AWQC and drinking water screening values to be a legal standards that must be addressed.[*ORR Jim*] DEQ agrees that the wells are separated from the slip water and no aquatic receptors are at the well but the Slip 1 wells are the compliance point for screening of groundwater that may reach the water. If there was a point closer to Slip 1 water or in transition zone water then the closer point would be used.

Ken Shump discussed that MW-6 is the source area for the groundwater plume on Northwest Pipe leased property and MW-5 is up gradient with MW-3/MW-4 downgradient of the source area. He repeated the conceptual model that the combination of VOCs in groundwater on the upgradient edge of the Northwest Pipe site and the consistent southerly direction of groundwater flow in this area point to another source of VOCs offsite and upgradient to the east or northeast. The variation of sampling data results was discussed as was the narrow extent of the plume. The potential source of volatile organic compounds (VOC) at the Port of Portland facility due to its long history of industrial use was discussed. The historic use of VOCs to treat grain stored at the former facility, as a potential source of VOC was also discussed.[*ORR Jim*] DEQ respectfully disagrees that there is significant evidence of an offsite source of VOCs offsite and up gradient of the NWP site to the east or northeast.

[*ORR Jim*]

DEQ does not find it necessary to amend the meeting comment letter but will include this email in the project file. Thanks

From: ORR Jim [<mailto:orr.jim@deq.state.or.us>]
Sent: Wednesday, June 24, 2015 5:56 PM
To: HeldtSheller, Stephanie; Shump, Ken/LYO; Wray, Mike
Subject: Meeting Comments and EPA Letter Review Schedule

Does the NWP team have a schedule for providing comments to respond to the EPA letter?

Any comments or additions to my meeting summary from our June 11th conference call?

Thank You

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